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6 Attorneys for Plaintiff
CRUMP INSURANCE SERVICES, INC.

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA

10 CRUMP INSURANCE SERVICES, INC.,

11 Plaintiff,

12 v.

13 MICHAEL P. MCGRATH, an individual,
14 ALL RISKS, LTD., a corporation, and
Does 1 through 50, inclusive,

15 Defendants.

Case No. C-07-4636 MMC

**DECLARATION OF DYLAN B. CARP
IN SUPPORT OF PLAINTIFF CRUMP
INSURANCE SERVICES, INC.'S
MOTION TO COMPEL DEFENDANT
ALL RISKS, LTD. TO RESPOND TO
REQUESTS FOR PRODUCTION NOS.
4, 7 AND 26 AND TO PRODUCE
UNREDACTED DOCUMENTS AND
MOTION TO COMPEL MICHAEL
MCGRATH, NICHOLAS CORTEZI,
AND CYNTHIA MARTY TO APPEAR
FOR FURTHER DEPOSITIONS
REGARDING THE DOCUMENTS**

16 Date: July 25, 2008
17 Time: 9:00 a.m.
18 Courtroom: 7

19 I, Dylan B. Carp, declare:

20 1. I am an associate with Jackson Lewis LLP, the attorneys of record for Plaintiff
21 Crump Insurance Services, Inc. ("Crump"). I submit this Declaration in support of Crump's
22 Motion to Compel. I have personal knowledge of the facts set forth below and, if called as a
23 witness, could testify competently to them.

24 2. I have in good faith conferred with the party failing to make discovery in an effort
25 to obtain it without court action.

2 Case No. C-07-4636 MMC
CARP DECLARATION IN SUPPORT OF PLAINTIFF'S MOTION TO COMPEL